

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Case: 2:23-mj-30203
Assigned To : Unassigned
Assign. Date : 5/19/2023
CMP: USA v WILLIAMS (MAW)

Tracy WILLIAMS

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 18, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

18 U.S.C. 922(o)

Felon in possession of a machinegun

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

Treva Eaton, Task Force Officer - ATF

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 19, 2023

City and state: Detroit, Michigan



Judge's signature

Hon. Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF
AN CRIMINAL COMPLAINT

I, Treva L. Eaton, being first duly sworn, hereby state:

1. I am a Detroit Police Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Detroit Police Officer since September 1996 and assigned to the ATF since May 2016. During my employment as a law enforcement officer, I have conducted and/or participated in numerous criminal investigations focused on firearms, firearms licensing, and narcotics violations.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. ATF is currently conducting a criminal investigation concerning Tracy WILLIAMS (B/M; DOB: XX/XX/1997) for violations of 18 U.S.C. §

922(g)(1) and 18 U.S.C. § 922(o) (Felon in Possession of a Firearm and Possession of a Machinegun).

PROBABLE CAUSE

4. On May 16, 2023, at approximately 9:10 pm, Detroit Police Officers were dispatched to 17860 Riopelle, Detroit, Michigan on a ShotSpotter detection alert. Per the ShotSpotter alert, 30 rounds were detected in the rear of the location of 17860 Riopelle in quick succession. The quick succession of the shots fired indicates that a fully automatic firearm was used. Officers checked the rear of the residence and recovered 25 brass .223 shell casings. Officers made contact with a male through a window who identified himself as Tracy WILLIAMS. WILLIAMS refused to open the door and informed the officers that he cannot have police contact because he is on probation. The incident was recorded on Detroit RMS # 2305160477.

5. On May 17, Detroit Police Detective Ziolkowski obtained a search warrant for 17860 Riopelle.

6. On May 18, at approximately 9:50 am, Detroit Police Tactical Services Section, and Firearms Investigation Team executed a search warrant at 17860 Riopelle. While executing the search warrant, officers observed WILLIAMS on the back roof holding a rifle. WILLIAMS laid the rifle on the roof and went back into the house through the window. Officers subsequently recovered

the rifle—a Radical Firearms Model RF-15 rifle serial number 23-010186 loaded with 1 live round of ammunition in the chamber and 11 live rounds of ammunition in the magazine—during the search of the residence.

7. Officers found additional firearms throughout the residence during the search, including:

- a. A 9-millimeter Glock Model 19 serial number AEGT597 loaded with 1 live round in the chamber and 13 live rounds of ammunition in the magazine, located on the kitchen table.
- b. A 40 caliber Glock Model 27 serial number 8MAV905 with an affixed laser loaded with 1 live round of ammunition in the chamber 13 live rounds of ammunition in the magazine, located in the main floor bedroom closet.
- c. A 7.62 caliber Century Arms model VSKA pistol serial number SVP003680 loaded with 1 live round of ammunition in the chamber and 52 live rounds of ammunition in the magazine, located in the living room.
- d. An AR pistol, no serial number, with a Sig Sauer scope loaded with 1 live round of ammunition in the chamber and 52 live rounds of ammunition in the magazine, located in the dining room.

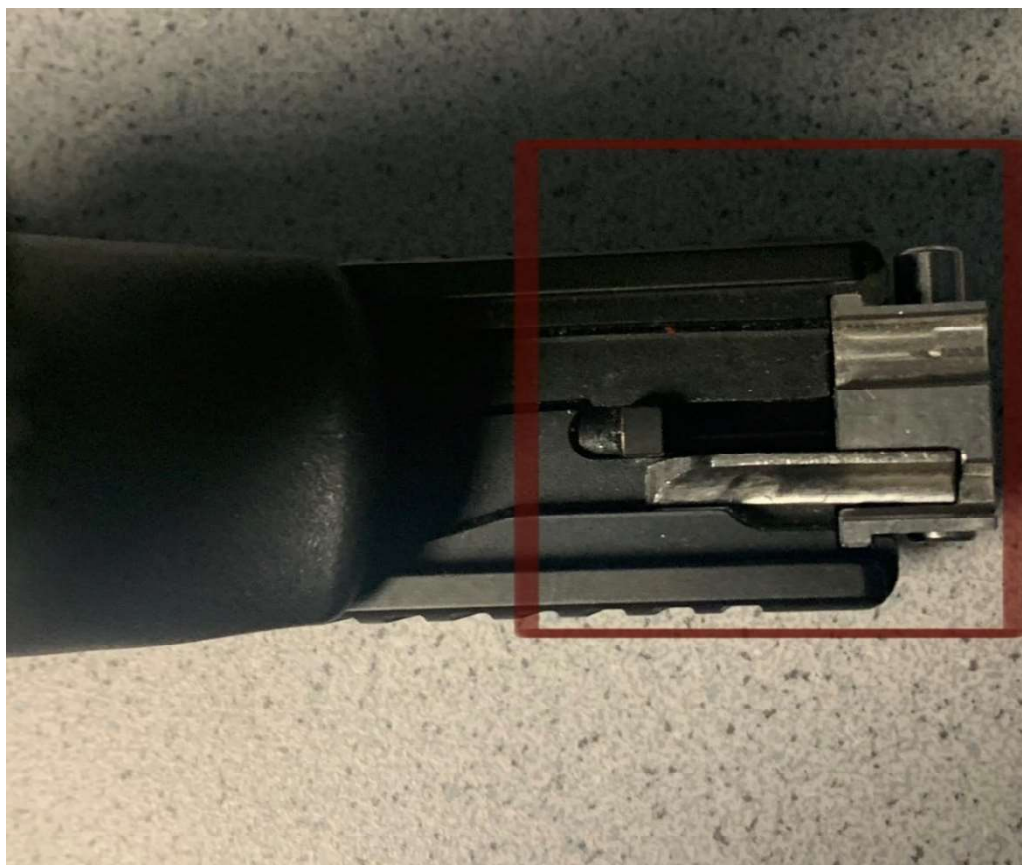
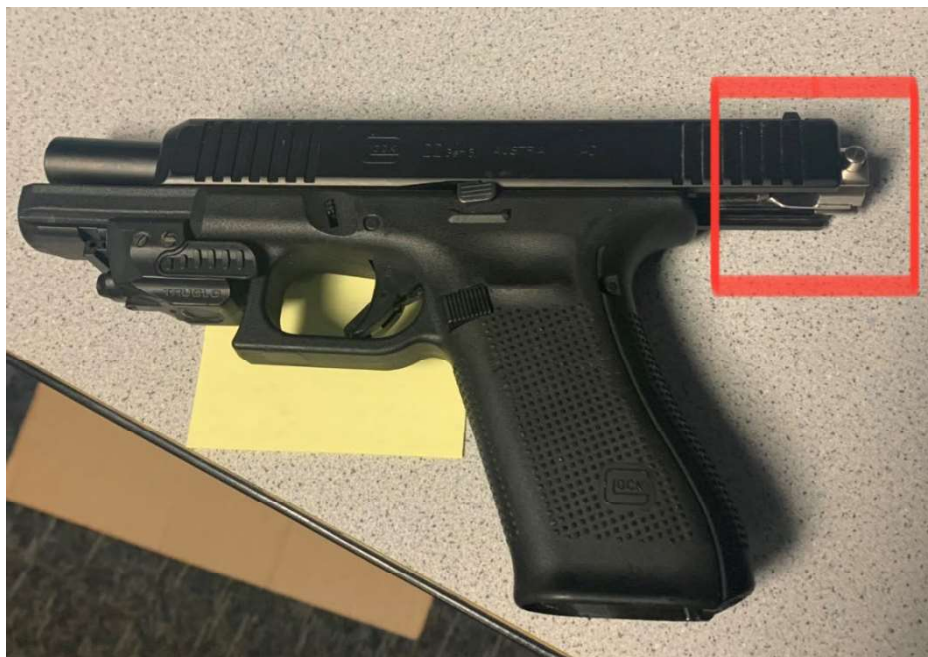
WILLIAMS' Statements and Criminal History

8. During the search of 17860 Riopelle, WILLIAMS made post-*Miranda* statements to the officers and agents conducting the search. Specifically, Williams admitted that he bought and owned the residence, and admitted to knowing that there were firearms in the home.

9. I reviewed a computerized criminal history for WILLIAMS and determined that he is a convicted felon. Specifically, on October 13, 2021, WILLIAMS pleaded guilty in Kent County Seventh Circuit Court to one count of conducting a criminal enterprise, a felony. WILLIAMS was sentenced to serve a term of thirty days in jail, and three years and one day of probation, beginning on October 13, 2021.

Automatic Weapons and Conversion Devices

10. During the search of 17860 Riopelle, officers also found a Glock Model 22 serial number BTSG015 with an extended magazine loaded with 1 live round of ammunition in the chamber and 22 live rounds with live ammunition in the magazine, located living room. Affixed to the Glock is a conversion device colloquially known as a "Glock switch" (depicted below).



11. ATF Special Agent Kenton Weston also viewed the above images. In addition to basic ATF training, Special Agent Weston is a graduate of a specialized course on privately made firearms (PMFs) and machinegun conversion devices (MCDs). Special Agent Weston has provided instruction to DPD officers, ATF Special Agents, and Task Force officers on the identification of PMFs and MCDs. Special Agent Weston has experience in the investigation, seizure, and examination of dozens of PMFs and MCDs. After viewing the photographs, Special Agent Weston confirmed that the device affixed to the firearm appeared to be a type of MCD known as a “Glock switch.”

12. Per Special Agent Weston, an individual can affix an MCD to a Glock-style pistol to make the pistol shoot automatically and function as machinegun. The MCD is a small device that replaces the back plate and typically protrudes from the back of the slide on a Glock-style pistol. When installed, the device applies pressure to the trigger bar and disables the firearm’s ability to limit one round of ammunition to be fired per trigger pull. A machinegun is a firearm under the National Firearms Act (NFA), 26 U.S.C. § 5845. A machinegun is defined, in pertinent part, as “any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun.” 26 U.S.C. § 5845(b). An MCD is a part, or combination of parts, designed and intended to convert a semiautomatic Glock-

style pistol into a machinegun; therefore, it by itself, is a machinegun as defined by 26 U.S.C. § 5845(b).

13. During the execution of the search warrant at 17860 Riopelle, officers also recovered an AR-15 style PMF “ghost gun” which is a gun that lacks a serial number by which it can be identified and that is typically assembled by the user (as from purchased or homemade components). Officers located this firearm in the living room. Inside the AR-15 style PMF officers found an MCD, as depicted below.





14. Special Agent Weston examined the MCD recovered from inside the recovered AR-15 style PMF. Based on the size, shape, and material this MCD appears to be a “Mothers Demand Full Auto” 3D printed auto sear. When installed into an applicable firearm, this MCD disables the firearm’s ability to limit one round of ammunition to be fired per trigger pull and exactly like the aforementioned Glock switch.

15. Special Agent Weston is also an ATF interstate nexus expert. On May 18, 2022, Special Agent Weston advised that the firearms recovered from 17860 Riopelle were manufactured outside of the state of Michigan, and therefore have traveled in and affected interstate commerce.

CONCLUSION

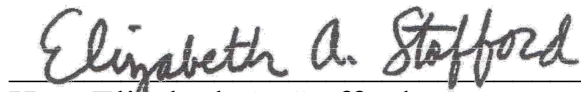
16. There is probable cause to believe Tracy Williams (B/M; DOB: XX/XX/1997), a convicted felon, did knowingly and intentionally possess firearms, said firearms having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1), and possess a machinegun, as defined in 26 U.S.C. § 5845(b) and in violation of 18 U.S.C. § 922(o). These violations occurred on or about May 18, 2023, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Treva L. Eaton
Task Force Officer, ATF

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: May 19, 2023